

Summary of NRC Public Meeting on Safety Culture Initiatives January 18, 2006

The purpose of this meeting was to discuss the NRC staff's progress on the Safety Culture Initiatives with stakeholders, focusing on the treatment of findings in the cross-cutting areas of the Reactor Oversight Process (ROP), the development of the Safety Culture Components and how they are aligned within the cross-cutting areas.

Demonstration of treatment of findings within the cross-cutting areas

The staff presented a demonstration of how a number of previous findings for two plants would be treated in the cross-cutting areas under the proposed approach. The staff explained the approach taken for the demonstration, plant selection process, and limitations and assumptions. There were some discussions on the specific examples and which cross-cutting areas they best fit under, and the staff explained why specific areas were chosen based on the information publically available. The demonstration showed that for both plants, the results of the cross-cutting area assessments did not change under the proposed approach.

The staff then discussed a review it conducted of the treatment of previous inspection findings (approximately 30) under the proposed process. Overall, the staff concluded that the number of substantive cross-cutting issues should not significantly change due to the proposed changes. The staff emphasized that the proposed changes will facilitate improved predictability and consistency in the treatment of cross-cutting issues, common understanding of causal themes, and alignment with what is important about safety culture, when compared with the existing cross-cutting definitions. In addition, another benefit is the proposed approach better aligns with what licensees are doing in the area of safety culture, which allows for better leverage of licensee efforts.

There was extensive discussion on the process for determining a substantive cross-cutting issue. The staff explained that the process currently and as planned involves having findings (i.e., performance deficiencies) within the same cross-cutting area, where more than three findings have been determined to have a common theme, and the NRC has a concern with licensee efforts to address the cross-cutting area performance deficiency. These criteria must all be met for NRC to determine a substantive cross-cutting issue exists. In addition, the staff reiterated that there must be a finding (i.e., a performance deficiency) before the cross-cutting aspects would be considered. There was discussion on how deeply the inspector would investigate causal factors. The staff explained that the causal factors would be investigated at the first level and that findings would be, as they are now, discussed with the licensee during the inspection process.

There was discussion regarding the documentation of NRC's review of licensee efforts in addressing the cross-cutting area performance deficiency, after the other criteria are reached. Specifically, there was a concern that decisions which do not result in substantive cross-cutting issues due to NRC being satisfied with licensee efforts are not documented and on the public record. The staff took an action to further review this item.

Several stakeholders discussed potential effects of the proposed changes to the Safety Conscious Work Environment (SCWE) cross-cutting area. Under the proposed approach, one finding with a SCWE cross-cutting aspect would meet the criteria for entry into the review process. The staff explained that since the inspection program will stay the same, it does not

anticipate an increase in the number of findings with a SCWE cross-cutting aspect. Stakeholders also requested clarification on the component definitions and how they would be applied. The stakeholders and staff discussed several different examples of findings with a SCWE cross-cutting aspect to provide clarification.

There was a recommendation for the staff to consider collecting data on the themes in the cross-cutting areas across the industry for trending purposes. The staff answered that it would take the suggestion into consideration and forward to the group who works on such issues.

Industry Presentation on NRC Safety Culture Components and ROP Revisions

A member of the Nuclear Energy Institute (NEI) made a presentation at the meeting (the slides are posted on the NRC safety culture website under the “Industry Presentation” link.) One of the points made in the presentation is that the NRC should look at the causal drivers of problems, rather than the quality of administrative programs related to problems. NRC staff clarified that the causes, not programs, are indeed the focus of regulatory oversight.

Description of Safety Culture Components

NRC staff presented the revised proposed safety culture components, explained the revision process that was used, and how stakeholder comments were incorporated (the slides are posted on the NRC safety culture website under the “Meeting Slides” link.) There was a question raised about why “resources” was included, since there are many reasons for resource issues that have nothing to do with NRC’s regulatory purview. NRC staff answered that the only time it would be considered is if there were a cross-cutting aspect associated with a finding. For example, if a finding is caused in part by a corrective action backlog that is substantial because resources are not adequate to address problems, that is a safety/performance issue.

Safety Culture Initiative Summary

NRC staff presented a summary of the proposed approach for treating safety culture within the ROP (the slides are posted on the NRC safety culture website under the January 18, 2006 Public Meeting, “Safety Culture Initiative Approach” link.) The presenter stressed that NRC doesn’t intend for safety culture components to be inspected to in the baseline inspection program, rather they would be considered in conjunction with a finding relative to the cross-cutting aspects, as is currently the case. Further, a cross-cutting aspect of an issue could not be used to elevate it to a finding – the current threshold of more-than minor would remain.

Stakeholders raised questions about the proposed SCWE components and how these might be addressed in the proposed process. Questions were also raised about how the safety culture oversight enhancements would be incorporated into inspection procedures 95001, 95002, and 95003, respectively for progressively declining performance. NRC staff indicated that these issues would be further clarified at the next public meeting. Additional discussion centered around what a safety culture assessment, if it was requested, would entail. NRC staff stated that it would expect all the safety culture components to be addressed in a safety culture evaluation.

Topics for Stakeholder Feedback

The following specific issues were identified for stakeholder feedback:

- The safety culture components will be finalized soon. The best opportunity for stakeholders to provide the NRC with any further comments is the next few days by January 25th. NRC staff encouraged participants particularly to provide feedback on any language in the component definitions that needs clarification.
- Staff agrees that NRC needs to focus on implementation and not programs with respect to cross-cutting issues; stakeholders should let NRC know if NRC can improve in some areas.

NRC Action Items

In response to the comments and questions at the meeting, NRC staff agreed to take the following actions:

- Staff will clarify the definition of the component, “resources” in the Human Performance cross-cutting area.
- If NRC gets to the third criterion for a substantive cross-cutting issue, and decides not to identify it as a substantive cross-cutting issue, staff will think about how to document that decision. Similarly, if staff has the option to request that the licensee have a safety culture assessment but decides there is a rationale for not asking for a safety culture evaluation, staff will document that decision.
- Staff will clarify guidance and explanation on whether a finding is “recent.”
- Staff will consider how to do an industry-wide trend analysis for cross-cutting issues.
- Staff will provide examples on the treatment of SCWE. There is not a lot of experience with that, so the examples probably will have to be constructed rather than taken from experience.
- Staff will continue to address the issue of the scope of self-assessments. NRC has committed to provide all external stakeholders an opportunity to understand what NRC is changing based on the proposed approach. NRC will provide the draft changed inspection procedures for comment.
- Staff will consider how to make the safety culture components readily and publicly available.

Next steps

- NRC staff is presenting at an ACRS subcommittee meeting on January 25th. The primary feature of the talk will be the safety culture components.
- NRC staff is planning a teleconference between January 31st and February 2nd to discuss details for the next public meeting, tentatively in mid-February.